

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW STEIN and JEROME LHOTE,

Plaintiffs/Counterclaim Defendants,

v.

SKATTEFORVALTNINGEN,

Defendant/Counterclaim Plaintiff,

v.

LUKE MCGEE,

Counterclaim Defendant.

No. 23 Civ. 2508 (NRB)

**STIPULATION AND [PROPOSED] ORDER**

Plaintiffs/ Counterclaim Defendants Matthew Stein (“Stein”) and Jerome Lhote (“Lhote”), Defendant/ Counterclaim Plaintiff Skatteforvaltningen (“SKAT”), and Counterclaim Defendant Luke McGee (“McGee”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

**WHEREAS**, on March 24, 2023, Plaintiffs Stein and Lhote filed their Complaint [ECF No. 11] in this action, and on June 15, 2023, Defendant SKAT filed its First Amended Answer, Affirmative Defenses and Counterclaims [ECF No. 48], in which it asserted counterclaims against Stein and Lhote, and against McGee;

**WHEREAS**, Stein and Lhote filed a motion to dismiss the counterclaims asserted by SKAT [ECF No. 50], and McGee joined in that motion [ECF No. 56];

**WHEREAS**, on February 1, 2024, the Court entered an order denying the motion to dismiss [ECF No. 87];

**WHEREAS**, pursuant to Rule 12(a)(4), Fed.R.Civ.P., Lhote, Stein and McGee's answer to the counterclaims is due on February 15, 2024, and on February 15, 2024, the parties filed a Stipulation and Proposed Order extending that deadline until March 4, 2024 [ECF No. 89]; and

**WHEREAS**, counsel for the parties have conferred and agreed on the below schedule for discovery in this action.

**NOW, THEREFORE**, the parties hereby stipulate and agree as follows:

1. The deadline for substantial completion of the document productions shall be February 20, 2024. The parties agree that they will complete productions of documents in response to any document requests served prior to January 20, 2024 by February 20, 2024.
2. Any amendment of the pleadings shall be made by March 4, 2024.
3. The last day to request that the Court authorize a Hague Convention request shall be March 13, 2024.
4. The deadline to complete fact depositions (other than pursuant to the Hague Convention) shall be May 1, 2024.
5. All written discovery (including Interrogatories and Requests for Admission) shall be served by May 1, 2024.
6. Rule 26(a)(2) Expert Reports shall be served by June 3, 2024.
7. Rule 26(a)(2) Rebuttal Expert Reports shall be served by June 24, 2024.
8. The deadline to complete expert discovery shall be July 15, 2024.

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/s/  
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*Counsel for Counterclaim Defendant Luke  
McGee*

SO ORDERED:

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Naomi Reice Buchwald  
United States District Judge

February \_\_\_\_, 2024